1 2 3 4 5 6 7 8 9		TE DISTRICT COURT					
10	NORTHERN DISTRICT OF	CALIFORNIA - SAN FRANCISCO					
11	KULGINDER SRAN,) Case No. C-15-4471-JST					
12	Plaintiff,	STIPULATION AND [PROPOSED] ORDER CONTINUING EXPERT					
13	i minini,	REBUTTAL AND EXPERT DISCOVERY DEADLINES					
14	VS.	Complaint Filed: September 30, 2015					
15	REGENTS OF THE UNIVERSITY OF) Complaint 1 nea. September 30, 2013					
16	CALIFORNIA)					
17	Defendants.)					
18)					
19							
20	RECITALS						
21	WHEREAS the parties have exchange	ed written discovery and substantial documents in					
22	the case, conducted numerous witness depositions, and otherwise diligently worked together to						
23	move the case forward;						
24	WHEREAS the current deadline to disclose rebuttal expert witnesses is May 1, 2017;						
25	WHEREAS the current expert discovery cutoff is May 15, 2017;						
26	WHEREAS the parties are in the process of completing substantial expert witness						
27	discovery;						
28	WHEREAS both parties anticipate disclosing rebuttal expert witnesses;						
	-1-						
	STIPULATION AND [PROPOSED] ORDER – Case No. C-15-4471-JST						

1

2

3

4

5

6

7

8

9

10

11

12

13

14

15

16

17

18

19

20

21

22

23

24

25

26

27

28

WHEREAS both parties anticipate taking multiple expert witness depositions;

WHEREAS the parties have identified an issue impacting the scope of testimony to be provided by expert witnesses relating to the issue of damages and therefore require additional time to meet and confer about the issue so as to reach a possible agreement;

WHEREAS the parties need additional time to meaningfully conduct expert witness discovery thereafter;

WHEREAS the parties are still in active settlement negotiations with Justice Lambden of ADR Services following mediation on November 15, 2016, and would like to continue participating in settlement discussions;

WHEREAS the parties respectfully request that the Court continue the current expert discovery deadlines as outlined by the parties below, or as soon thereafter as the Court is available.

WHEREAS the continuance of the deadlines as proposed below will not impact the August 14, 2017 trial date, or any other deadlines set by this Court.

WHEREAS, alternatively, the parties request a CMC to further discuss these issues with the Court.

STIPULATION

THEREFORE, IT IS HEREBY STIPULATED THAT the expert rebuttal and expert discovery cutoff deadlines are continued as follows:

Event	Current Date	Proposed Date
Expert rebuttal	May 1, 2017	June 16, 2017
Expert Discovery Cutoff	May 15, 2017	June 30, 2017

///

	1	Dated: April 20, 2017	GORDON & REES SCULLY MANSUKHANI LLP			
	2					
	3			By: <u>/s/ Jennifer M. Lynch</u> JENNIFER M. LYNCH		
	4			Attorney for De	fendant	
	5			REGENTS OF CALIFORNIA	THE UNIVERSITY OF	
	6	Dated: April 20, 2017		LEIGH LAW GROUP		
	7					
	8			By: <u>/s/ Jay Jambeck</u> Jay Jambeck		
	9			Attorney for Pla KULGINDER S	intiff SRAN	
	10					
	11	[PROPOSED] ORDER				
0	12	According to the parties' stipulation, and good cause appearing, it is hereby ordered that				
Gordon & Rees LLP 275 Battery Street, Suite 2000 San Francisco, CA 94111						
es LL Suit NA 94	13	the expert rebuttal and expert discovery cutoff deadlines of this matter are hereby continued as				
Gordon & Rees LLP 5 Battery Street, Suite 20 San Francisco, CA 9411.	14	follows:				
don e ery S ranci	15		<u> </u>		T	
Gor Batt an Fì	16	Event	Current Date		Proposed Date	
275 S	17	Expert rebuttal Expert Discovery Cutoff	May 1, 2017 May 15, 2017		June 16, 2017 June 30, 2017	
	18		1		1	
	19	IT IS SO ORDERED.				
	20	Dated: April 25, 2017		gard.	Jugar	
	21			Hon. Jon S. T	igar O	
	22					
	23					
	24					
	25					
	26					
	27					
UCR/1112749/325	28 81486v.1			3-		

-3-STIPULATION AND [PROPOSED] ORDER – Case No. C-15-4471-JST